

REMARKS/ARGUMENTS

This Amendment is being filed in response to the Final Office Action dated July 6, 2009. Reconsideration and allowance of the application in view of the remarks to follow are respectfully requested.

Claims 1-13 are pending in the Application.

In the Final Office Action, claims 1 and 13 are rejected under 35 U.S.C. §112, first and second paragraphs. In effect, the Final Office Action objects to the language "produces an image that is viewable ...". Claims 1 and 13 are amended herein to clarify that which is recited in the claims. Support for the amendment to claims 1 and 13 is provided by the present application, page 2, lines 21-22 which makes clear that in accordance with the present system, (emphasis added) "[t]he drive voltages and the duration of the drive periods have to be selected to obtain an optical state of the pixel fitting the image signal to be displayed." It is respectfully submitted that this clarification to claims 1 and 13 overcomes the rejections of claims 1 and 13 under 35 U.S.C. §112, first and second paragraphs. Accordingly, it is respectfully submitted that claims 1 and 13 are in proper form and it is

respectfully requested that these rejections under 35 U.S.C. §112, first and second paragraphs, be withdrawn.

In the Final Office Action, claims 1-3, 7-9 and 13 are rejected under 35 U.S.C. §102(e) over U.S. Patent No. 6,507,330 to Handschy ("Handschy"). Claim 4 is rejected under 35 U.S.C. §103(a) over Handschy in view of Admitted Prior Art. Claim 5 is rejected under 35 U.S.C. §103(a) over Handschy in view of U.S. Patent No. 6,507,330 to Abramson ("Abramson"). Claims 6 and 10-12 are rejected under 35 U.S.C. §103(a) over Handschy in view of U.S. Patent No. 6,961,047 to Katase ("Katase"). It is respectfully submitted that claims 1-13 are allowable over Handschy alone and in view of any combination of Admitted Prior Art, Abramson, and Katase for at least the following reasons.

It is not disputed that Handschy shows DC-balancing of a pixel display (See, Handschy, Col. 9, lines 31-44, as cited in the Final Office Action, page 4). However, it is respectfully submitted that Handschy provides balancing between two pixel intervals, wherein in the first interval, the voltage and given duration produce an image that fits the input image data and a second interval, wherein the voltage and given duration produce an image that does not fit the input image data, but that is provided for the purposes of DC-

balancing. (See, Handschy, FIG. 3 and accompanying description contained in Col. 9, lines 50-57.)

In a Response To Arguments section of the Final Office Action (see, Final Office Action, page 15), a position is taken that Col. 8, lines 36-42 are cited by the Final Office Action for allegedly showing the claim recitation, not Col. 9, lines 50-57 as discussed in the previous amendment submitted on May 18, 2009 and as discussed above. While this is also true of the Final Office Action recitations from Handschy, it is respectfully submitted that Handschy makes clear that the description contained in Col. 9, lines 50-57 is a description of the same system described in Col. 8, lines 36-42 cited in the Final Office Action, but provided "in a little more detail." (See, Handschy, Col. 8, lines 58-59.)

The Response To Arguments section of the Final Office Action also cites FIG. 11 in support of the rejection, however, it is respectfully submitted that reliance on FIG. 11 is misplaced. Again Handschy makes clear in the discussion of FIG. 11 contained in Col. 13, lines 35-42, that the drive interval of the pixel is broken into two parts, one labeled 2.7 ms and another labeled 1.35 ms in FIG. 11. "For the second period of FIG. 11, however, the drive voltages are doubled to ± 3.0 volts for the non-visible

inverse image." (See, Handschy, Col. 13, lines 40-42, particularly, emphasis added.)

Accordingly, the display apparatus of claim 1 is not anticipated or made obvious by the teachings of Handschy. For example, Handschy does not teach, disclose or suggest, a display apparatus that amongst other patentable elements, comprises (illustrative emphasis added) "a driver for supplying a sequence of drive voltages across the pixel during corresponding successive drive periods, wherein each of the sequence of drive voltages and drive periods are applied while the pixel is being driven by input image data that produces an image that is fitting the input image data; and a DC-balancing circuit comprising a controller for determining a time-average value for each pixel, used to adjust at least one of the value of the drive voltage and the duration of the corresponding drive period while the pixel is being driven by the input image data that produces the image that is fitting the input image data, to obtain a substantially zero value of the time-average value for each consecutive field of the pixel" as recited in claim 1, and as similarly recited in claim 13. Abramson, and Katase are cited for allegedly showing features of dependent claims and as such, do not cure the noted deficiencies in Handschy.

Based on the foregoing, the Applicant respectfully submits that independent claims 1 and 13 are patentable over Handschy and notice to this effect is earnestly solicited. Claims 2-12 respectively depend from claim 1 and accordingly are allowable for at least this reason as well as for the separately patentable elements contained in each of the claims.

Regarding claim 4, the Final Office Action in the Response to Arguments section, a recitation from paragraph [0025] of the present application is taken out of context to support the notion that the elements of claim 4 are admitted in the prior art. This position is respectfully refuted, while it is true that the present application states that "[t]his reset pulse [of claim 4] operates in the same manner as in the prior art", paragraph [0025] further makes clear that (emphasis added) "[i]t is an advantage [in claim 4] over the prior art that this reset pulse is supplied only sporadically and only to those pixels where it is required, and thus the visual performance is degraded less frequently and only for the relevant pixels." In terms of claim 4, the claim clearly is different than prior reset pulses in that "the controller is adapted for comparing an absolute value of the number with a threshold number to supply a reset pulse to the pixel when an

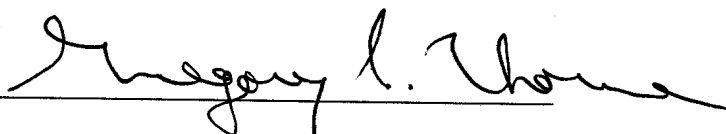
absolute value of the number for the pixel surpasses the threshold number" and therefore, is only provided sporadically as discussed in paragraph [0025] of the present application. Accordingly, it should be clear that Applicant has not admitted in paragraph [0025], that the elements of claim 4 are in the prior art.

Accordingly, separate consideration and allowance of each of the dependent claims is respectfully requested.

In addition, Applicant denies any statement, position or averment of the Examiner that is not specifically addressed by the foregoing argument and response. Any rejections and/or points of argument not addressed would appear to be moot in view of the presented remarks. However, the Applicant reserves the right to submit further arguments in support of the above stated position, should that become necessary. No arguments are waived and none of the Examiner's statements are conceded.

Applicant has made a diligent and sincere effort to place this application in condition for immediate allowance and notice to this effect is earnestly solicited.

Respectfully submitted,

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